

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**RE: INVESTIGATION INTO MASSACHUSETTS
ELECTRIC'S SERVICE QUALITY FILINGS**

DTE 01-71B

PETITION TO INTERVENE OF THE UTILITY WORKERS UNION OF AMERICA

The Utility Workers Union of America ("UWUA") hereby petitions to intervene in the Department's investigation into the service quality filings of Massachusetts Electric Company. In support of this motion and in accordance with 220 CMR 1.03, UWUA states:

1. UWUA is a national union with more than 50,000 members in local unions located across the United States. It has more than 5,000 members in Massachusetts, including approximately 1,000 members on MECo's property. UWUA's members are extremely knowledgeable about what a utility company must do to maintain safe, affordable and reliable supply. Its members have first-hand experience with MECo's policies and practices regarding inspections, maintenance, system design and planning, outage response, customer service, billing, and related operations that directly affect service quality. In addition, hundreds of UWUA's members and their families are themselves MECo customers and are interested in receiving the highest quality service. UWUA maintains business offices at 220 Forbes Road, Braintree, Massachusetts 02184. Its main offices are in Washington, D.C.
2. UWUA has been an active participant in DTE 99-84, the antecedent proceeding to the present

docket, since its inception two years ago. Many of UWUA's recommendations in DTE 99-84 were incorporated by the Department into its orders in that docket, and UWUA has an interest in insuring that utility companies fully comply with those orders.

3. UWUA will be substantially and specifically affected by this proceeding in two ways. First, as employees of MECo, UWUA's members will be affected by this case because any order will likely alter or affect the ways in which employees carry out their work, in the areas of telephone response, inspection and maintenance, outage response, etc. Second, UWUA's members will also be affected as customers of MECo.
4. At this stage of the proceeding, UWUA states its general contention that the Department should require MECo to provide the highest-quality service that is feasible to provide. UWUA reserves the right to present evidence relevant to the issues in this case.

For the reasons presented above, UWUA asks the Department to grant its petition to intervene.

Respectfully Submitted,

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